



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE:

AUG 4 2017

SUBJECT:

**CLEAN AIR ACT INSPECTION REPORT
Edward C. Levy, Plant #3, Ecorse, Michigan**

FROM:

**Molly Smith, Environmental Scientist
AECAB (MI/WI)**

THRU:

**Sarah Marshall, Section Chief
AECAB (MI/WI)**

TO:

File

BASIC INFORMATION

Facility Name: Edward C. Levy, Plant #3 (Levy #3)

Facility Location: 100 Westfield, Ecorse, Michigan

Date of Inspection: June 26, 2017 and June 27, 2017

Lead Inspector: Molly Smith, Environmental Scientist

Other Attendees:

1. Victoria Nelson, Environmental Engineer, EPA
2. Katie Koster, Michigan Department of Environmental Quality
3. Benjamin Kroeger, Environmental Manager, Levy
4. Keith Crosson, Operations Supervisor, Levy
5. Gerry Williams, Plant Manager, Levy

Purpose of Inspection: Determine compliance with Title V Permit and general fugitive dust compliance.

Facility Type: blast furnace slag handling operation, including crushing and grinding of bulk solid materials containing manganese.

Regulations Central to Inspection: Permit compliance, and Michigan State Implementation Plan fugitive dust regulations.

June 26, 2017

Arrival Time: 1:45 PM EST

Departure Time: around 4:00 PM EST

June 27, 2017

Arrival Time: 2:00 PM EST

Departure Time: 5:00 PM EST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Ben Kroeger unless otherwise noted.

Company Ownership: Levy #6 operates the bulk solid handling operation. The facility's main operations deal with handling the blast furnace slag from the entire US Steel Great Lakes steel mill.

Process Description:

Levy #3 handles the blast furnace slag from the US Steel Great Lakes steel mill. Levy #3 begins its operations as soon as the slag material comes out of the furnaces. The slag is cooled with continuously sprayed water. Once the slag is cooled, Levy #3 begins processing the material to various sizes. Levy #3 uses two ball drops to crush material, as well as various crushing and screening conveyor systems. The materials are all stored in outdoor, open-air storage piles. The facility does use "dust bosses" to control fugitive emissions from the loading/unloading areas. The facility has a water truck on-site and there are spray nozzles on the transfer points of the conveyor systems.

All Method 9 readings are done by a third-party, Dorenzo, every two weeks. All environmental records are maintained in an electronic database system referred to as "LEAP."

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

EPA noted several areas with plumes of fugitive dust, specifically: off storage piles, from the ball drop pit areas, loading and unloading of truck, and the roadways (with and without vehicle traffic). EPA noted that the roadways were extremely dusty, and mentioned this several times to

Levy #3 staff. The facility was generally not operating during either tour due the hours of operation maintained at the site. Processing of material only occurs in the morning hours.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested documents:

- Safety Data Sheets for all slag handled at site
- Tonnage reports for 2016 throughputs at the facility
- 2014-2016 Annual Emissions Reports
- Wind readings from the on-site meteorological station for 6/26/17
- Method 9 Readings for the following (randomly selected) months:
 - November 2014
 - September 2016
 - March 2017

Compliance Assistance: EPA discussed the importance of keeping the roadways wet to control fugitive dust.

Concerns: EPA discussed fugitive dust concerns and the importance of control fugitive dust, which in turn controls fugitive manganese.

SIGNATURES

Lead Inspector: Molly Smith Date: 8/3/17

Section Chief: Sam W. Mason Date: 8/4/17

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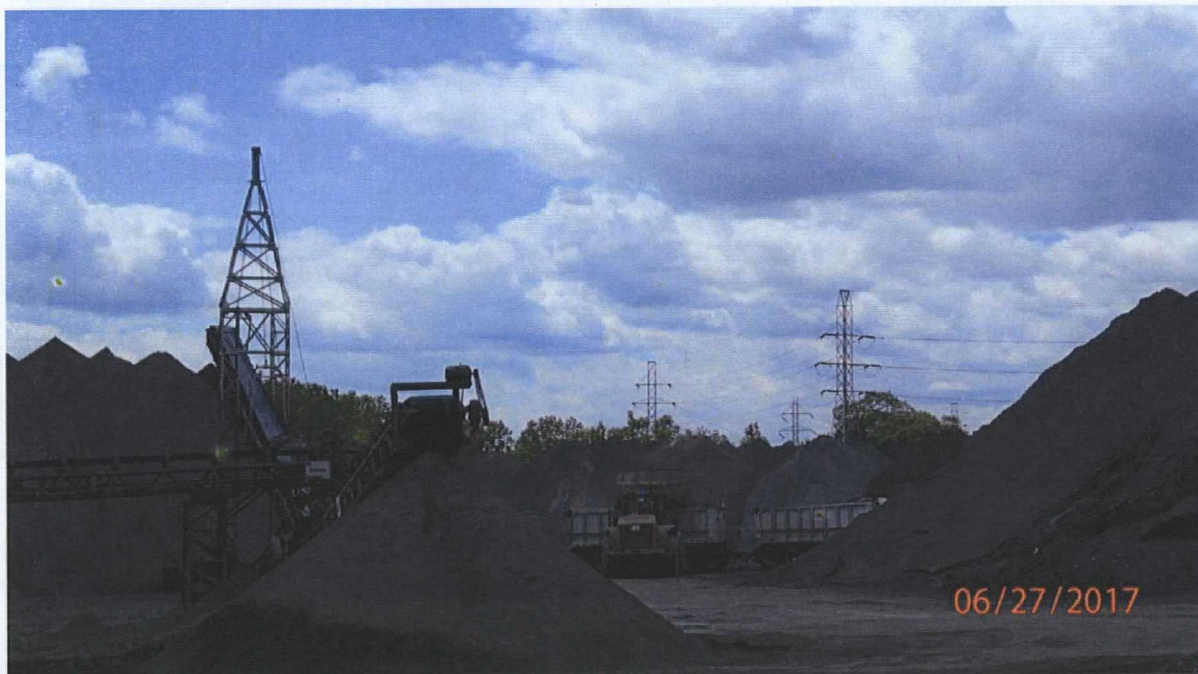
Date of Inspection: June 26, 2027

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Molly Smith			2. Archival Record Location: C:Drive	
Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	P6270002	6/27/17 2:12 PM	43.72,21.25	Truck Loading
2	P6270003	6/27/17 2:12 PM	43.72,21.25	Truck Loading
3	P6270004	6/27/17 2:12 PM	43.72,21.25	Truck Loading
4	P6270009	6/27/17 2:27 PM	43.99, 9.99	Storage Pile Area
5	P6270010	6/27/17 2:27 PM	43.99, 9.99	Storage Pile Area
6	P6270011	6/27/17 2:27 PM	43.99, 9.99	Storage Pile Area
7	P6270012	6/27/17 2:27 PM	43.99, 9.99	Storage Pile Area
8	P6270014	6/27/17 2:30 PM	44.80, 10.42	Truck Traffic
9	P6270015	6/27/17 2:30 PM	44.80, 10.42	Truck Traffic

10 videos were also taken.

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P627002

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P627003

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P627004

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P627009

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P6270010

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P6270011

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P6270012

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P6270014

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P6270015